

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 4:20CR000034 RWS
FREDDIE LEE DOYLE, JR.,)	
)	
Defendant.)	

GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)

COMES NOW the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said District, and makes the following disclosure pursuant to Federal Rule of Criminal Procedure 12(b)(4).

At trial, the Government intends to use the evidence seized and statements made by the defendant and other witnesses during the events described below, and as described in the discovery letter and its attachment provided to defense counsel on January 28, 2020. This evidence and these statements are more fully set forth in the investigative reports and records, which have been made available to defendant. The Government has listed the evidence below that it believes a defendant could possibly argue standing to contest, although the Government is in no way conceding that any defendant, in fact, has standing on these events.

Also, as additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose to use evidence in addition to that listed below. Therefore, a supplemental Rule 12(b)(4) notice may be filed at a later date.

EVENT/ITEMS
911 and jail calls
Scene Photos near Rehab Bar
SLMPD Report 19-30337 and supplemental reports
St. Louis City Jail disciplinary records
St. Louis City Jail pretrial records
SLMPD Lab Reports
Video footage
ATF trace detail

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Jennifer A. Winfield
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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

/s/ Jennifer A. Winfield
JENNIFER A. WINFIELD, #53350MO
Assistant United States Attorney